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COUNTY OF LOS ANGELES

CHIEF INFORMATION OFFICE

World Trade Center
350 S. Figueroa Street, Suite 188
Los Angeles, CA 90071

RICHARD SANCHEZ
CHIEF INFORMATION OFFICER

Telephone: (213) 253-5600
Facsimile: (213) 633-4733

December 15, 2009

To: Supervisor Gloria Molina, Chair
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Zev Yaroslavsky
Supervisor Michael D. Antonovich

From: Richard Sanchez
Chief Information Officer

A handwritten signature in cursive script, reading "Richard Sanchez", is written over the printed name and title.

Subject: **STATUS REPORT #2 ON IDENTITY THEFT PREVENTION PROGRAM**

On March 31, 2009, the Board of Supervisors adopted Policy # 7.100 - Identity Theft Prevention Program (ITPP) to comply with Federal Fair and Accurate Credit Transactions Act (FACTA) regulations (i.e., the Identity Theft Red Flags Rule) and requested the Chief Information Office to submit progress reports on the implementation of the ITPP.

Since the last report, we completed an assessment of the County's information systems that maintain covered accounts. Based on results of this assessment, sixteen (16) departments may potentially be sanctioned by FACTA and may be ITPP participants.

In the next reporting period, the following activities are scheduled to be completed:

- Finalize ITPP guidelines with County Counsel and outside Counsel to address compliance obligations;
- Confirm which departments must comply with FACTA regulations and require ITPP participation;
- Disseminate and review ITPP guidelines with impacted departments; and
- Initiate implementation of ITPP guidelines with each department.

On October 30, 2009, the Federal Trade Commission (FTC), the federal agency responsible for enforcing the Identity Theft Red Flags Rule, announced that the enforcement deadline will be delayed until June 1, 2010. The FTC previously extended the compliance deadline until November 1, 2009. This new delay represents the fifth deadline extension since November 1, 2008.

Each Supervisor
December 15, 2009
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We will continue to monitor any further changes to FACTA, including any legislative developments that may impact the County's compliance obligations.

The next status report will be provided to your Board on or before June 7, 2010. If you have any questions regarding this status report, please contact me, or your staff may contact Robert Pittman, Chief Information Security Officer, at (213) 253-5631 or rpittman@cio.lacounty.gov.

RS:RP:pa

c: William T Fujioka
Board IT Deputies
Ellen Sandt
Sheila Shima
Brence Culp
Lari Sheehan
Jacqueline White
All Department Heads

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January 6, 2011

To: Supervisor Michael D. Antonovich, Mayor ✓
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Don Knabe

From: Richard Sanchez
Chief Information Officer

IDENTITY THEFT PREVENTION PROGRAM (ITEM NO. 21, AGENDA OF MARCH 31, 2009) – STATUS REPORT NO. 4

In our last status report submitted in June 2010, we informed your Board that County compliance with the Fair and Accurate Transactions Act (FACTA) Red Flags Rule had been deferred due to Federal Trade Commission (FTC) numerous delays in the enforcement deadline and potential legislative revisions.

On December 18, 2010, President Obama signed the Red Flag Program Clarification Act of 2010 (S.3987), which limits the circumstances in which the Red Flags Rule covers creditors. To reflect these changes, the FTC has revised the Rule and will be issuing new compliance guidelines.

The CIO will be analyzing these changes to determine their impact on County compliance obligations. This will include recommended revisions to the County's Identify Theft Prevention Program (Board Policy # 7.100), changes to policy guidelines, and reevaluation of departments that could be potentially sanctioned.

If you have any questions regarding this status report, please contact me or Robert Pittman, CISO, at 213.253.5631 or rpittman@cio.lacounty.gov.

RS:RP:pa

c: William T Fujioka, Chief Executive Officer
Chief Deputy, Chief Executive Officer
Board IT Deputies
Deputy Chief Executive Officers
All Department Heads